

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALLIANZ GLOBAL RISKS U.S.  
INSURANCE COMPANY, as subrogee of  
STAGE STORES, INC.,

Plaintiff,

- against -

L'OREAL U.S.A.,

Defendant.  
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Index No: 07 Civ. 2941 (WHP)

Filed:

**PLAINTIFF'S RULE 26(a)1**  
**DISCLOSURES**

Plaintiff, Allianz Global Risks U.S. Insurance Company ("Allianz"), as subrogee of Stage Stores, Inc., ("Stage Stores"), by and through their attorneys, Budd Larner, P.C. and Denenberg Tuffley, PLLC, make the following initial disclosures pursuant to Rule 26(a)1 of the Federal Rules of Civil Procedure:

**A. INDIVIDUALS**

Plaintiff believes the following persons may have knowledge of discoverable information alleged with particularity in the pleadings:

1. Billie Haliday, 10201 Main Street, Houston, Texas. Ms. Haliday is a Stage Stores employee and is believed to have knowledge of the purchasing/ordering system/relationship between Stage Stores and its vendors.
2. Ceci Tan, exact address unknown. Upon information and belief, Ms. Tan is an employee of Billion Tower Int' LLC, a vendor whose products were involved in the theft incident. She is believed to have knowledge regarding the purchasing/ordering system/relationship between Stage Stores and Billion Tower regarding the shipment of goods in question.
3. Anita Von Feldt, 10201 Main Street, Houston, Texas. Ms. Von Feldt is a Stage Stores employee and is believed to have knowledge regarding the purchasing/ordering system/relationship between Stage Stores and its vendors, including but not limited to L'Oreal USA.

4. Kim Stewart, 10201 Main Street, Houston, Texas. Ms. Stewart is a Stage Stores employee and is believed to have knowledge regarding the purchasing/ordering system/relationship between Stage Stores and its vendors, including but not limited to L'Oreal USA.
5. Paul Schuts, exact address unknown. Mr. Schuts is listed as "shipper" under a bill of lading document and is therefore believed to be a US Express employee who would have knowledge of the shipping relationships/events involved in this loss.
6. Officer Merrit, 104 West Cecil Avenue, North East Maryland. Officer Merrit was the office in charge of the investigation of the theft of the product at issue on March 3, 2005.
7. Brian Orr, 4080 Jenkins Road, Chattanooga TN. Mr. Orr is believed to be an U.S. Express employee and is believed to have knowledge of the shipping relationship/events involved in this loss.
8. Aaron Bragg, 4080 Jenkins Road, Chattanooga, TN. Mr. Bragg is believed to be an U.S. Express employee and is believed to have knowledge of the shipping relationship/events involved in this loss.
9. Lisa Burns, 4080 Jenkins Road, Chattanooga, TN. Director of Claims, U.S. Express. Ms. Burns is believed to have knowledge of the shipping relationship/events and claims involved in this loss.
10. Brad Breech, 4080 Jenkins Road, Chattanooga, TN. Mr. Breech is believed to be an employee of U.S. Express and have knowledge of the shipping relationship events involved in this loss.
11. Diane LaBorde, Director Risk Management, 10201 Main Street, Houston. Ms. LaBorde is believed to have knowledge regarding the purchasing/ordering system/relationship between Stage Stores and its vendors, including but not limited to L'Oreal USA, along with other risk management information involved in the loss.
12. Ann Owens, Director of Traffic, 10201 Main Street, Houston. Ms. Owens is believed to have knowledge relating to the purchasing/ordering/shipping relationship between Stage Stores and its vendors, including but not limited to L'Oreal USA.
13. Frank Morris, Allianz Global Risks U.S. Insurance Company, General Adjustor, New York, New York. Mr. Morris is believed to have knowledge regarding the claim and adjustment of the claim in question.

14. Michael Shaw, Transportation Manager, L'Oreal USA. Mr. Shaw is believed to have knowledge of the purchasing/ordering/shipping relationship and events between L'Oreal and its customers, including but not limited to Stage Stores.
15. G. Grubbs, Senior VP Distribution and Logistics, Stage Stores, 10201 Main Street, Houston, Texas. Mr. Grubbs is believed to have knowledge regarding the purchasing/ordering/shipping relationship and events between Stage Stores and its vendors, including but not limited to L'Oreal USA.
16. Scott Woods, 10201 Main Street, Houston, Texas. Mr. Woods is a Stage Stores employee and is believed to have knowledge regarding the purchasing/ordering/shipping relationship and events between Stage Stores and its vendors, including but not limited to L'Oreal USA.
17. Brenda Vige, Associate Buyer, Cosmetics and Fragrances, Stage Stores, 10201 Main Street, Houston, Texas. Ms. Vige is believed to have knowledge regarding the purchasing/ordering/shipping relationship and events between Stage Stores and its cosmetic and fragrance vendors, including but not limited to L'Oreal USA.
18. Celina Monroe, Stage Stores, 10201 Main Street, Houston, Texas. Ms. Monroe is believed to have knowledge regarding the purchasing/ordering relationship and events between Stage Stores and its vendors, including but not limited to L'Oreal USA.

**B. DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE ITEMS**

The Plaintiff is aware of the following non-privileged documents, data compilations and tangible items currently within its possession, custody or control which may be relevant to the disputed facts alleged with particularity in the pleadings.

1. Documents produced by Plaintiff as attachments to this Initial Disclosure, including invoices, bills of lading and purchase order documents and correspondence between Stage Stores and various purchasing and shipping vendors.
2. Allianz Global Risks U.S. Insurance Company's non-privileged claim file, claim No. P01043639, attached hereto.

**C. DAMAGE COMPILATIONS**

Plaintiff has asserted damages in the amount of \$490, 920.81. Please see Plaintiffs, non-privileged claim file which contains dated utilized in the compilation of Plaintiff's damages.

**D. INSURANCE AGREEMENTS**

Plaintiff refers Defendant's attention to the Allianz Global Risks U.S. Policy #CLP 3005984 attached hereto.

Dated: October 30, 2007

BUDD LARNER, P.C.

By: /s/  
Averim Stavsky  
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- and -

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